



Ontario Public Health Association
l'Association pour la santé publique de l'Ontario
Established/Établi 1949

The mission of OPHA is to provide leadership on issues affecting the public's health and to strengthen the impact of people who are active in public and community health throughout Ontario.

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Constituent Societies

ANDSOOHA – Public Health
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Association of Ontario
Health Centres

Association of Public Health
Epidemiologists in Ontario

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Canadian Institute of Public Health
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Health Promotion Ontario

Ontario Association of Public
Health Dentistry

Charitable Registration
Number 11924 8771 RR0001

May 28, 2015

Ministry of Municipal Affairs and Housing
Ontario Growth Secretariat
777 Bay St. Suite 425 (4th Floor)
Toronto, ON M5G 2E5

Attention: Richard Stromberg, Manager

Subject: EBR Posting 012-3256 – Co-ordinated Plan Review (Growth Plan for the Greater Golden Horseshoe; Greenbelt Plan; Oak Ridges Moraine Conservation Plan; Niagara Escarpment Plan)

The Ontario Public Health Association (OPHA) appreciates the opportunity to provide comments on the Province of Ontario's *Our Region, Our Community, Our Home* discussion paper and EBR Registry #012-3256 for the four plans (Growth Plan for the Greater Golden Horseshoe, Niagara Escarpment Plan, Oak Ridges Moraine Conservation Plan, and Greenbelt Plan).

Created in 1949, OPHA is a not-for-profit organization committed to providing leadership on issues affecting the public's health and strengthening the impact of people who are active in public and community health throughout Ontario. Our mission is achieved by providing professional development, timely information and analysis on public health issues, access to multi-disciplinary networks, advocacy on healthy public policy and expertise and consultation.

With an additional four million people expected to call Ontario home in the next 28 years, Ontario faces many land use planning challenges in how future growth and development in the Province is carried out. The goal to create healthy, livable communities through planning and growth policies aligns with the Ontario Ministry of Health and Long-Term Care's goal to improve public health through creating healthier built environments; we commend the Ministry on the coordinated review, which acts as a positive contribution to growth planning in Ontario.

Public Health Units across Ontario are addressing the complex issues and impacts related to the built environment including: air quality, climate change, water quality, access to healthy foods, obesity, physical activity, traffic related injuries, falls and general wellbeing across the lifespan. The growing body of research identifies the way our communities are designed can adversely affect the health of residents, as shown by increasing rates of obesity, diabetes, cardiovascular diseases, respiratory illnesses and exposures to environmental contaminants.

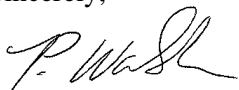
The *Improving Health by Design in the Greater Toronto-Hamilton Area* report of Medical Officers of Health in the GTHA¹ outlines how to strengthen Places to Grow including:

- ◆ Reconsider existing targets in order to increase the development of compact, complete communities. For example, it has been recommended that “government should gradually increase the Growth Plan’s density and infill targets every 10 years.” However, it has also been noted that there are challenges with how the existing targets are being interpreted and applied, as well as the extent of their achievement to date. Having targets implies that there are quality indicators that can be measured in a consistent and reliable manner.
- ◆ Expand the use of indicators beyond simply measuring density to better monitor the achievement of compact, complete communities. This might include establishing indicators and targets for levels of active transportation and public transit use. As noted elsewhere, the current Plan has a number of existing provisions that support performance measurement that have not yet been implemented.
- ◆ Provide incentives to municipalities to meet and exceed minimum targets. As noted in a recent review of the Plan, “there are no incentives for municipalities to achieve the minimum targets and no stated penalties for those that do not, nor are there any incentives for municipalities to exceed the minimum requirements of the Plan (although they are ‘encouraged’ to do so).”
- ◆ Support municipalities in implementing Places to Grow by providing tools to assess:
 - The economic costs of development over the long term (e.g., infrastructure, utilities, service provision) using different scenarios of intensity/density.
 - The health impacts of land use and transportation planning.
- ◆ Support a public health perspective on the achievement of healthy, compact, complete communities by:
 - Incorporating greater consideration of health impacts in the upcoming review of Places to Grow
 - Actively supporting the involvement of public health units in land use and transportation planning in municipalities to support health-based analysis of plans.

In addition to the above recommendations, the OPHA’s [Health and Built Environment Workgroup](#) has undertaken a review of the Provincial *Our Region, Our Community, Our Home* discussion document and has provided the following responses to relevant questions below for your consideration.

OPHA welcomes the opportunity to be part of this review and any follow-up processes. Thank you for your consideration and the opportunity to comment. By considering our comments, the province can demonstrate leadership in creating healthy, livable communities. Members of OPHA’s Health and Built Environment would be pleased to discuss our submission further with you and your colleagues and provide additional information or clarification as needed. We look forward to further involvement.

Sincerely,



Pegeen Walsh
Executive Director

¹ Improving Health by Design in the Greater Toronto-Hamilton Area report of Medical Officers of Health in the GTHA, May 2014. <https://www.peelregion.ca/health/resources/healthbydesign/pdf/moh-report.pdf>, Accessed May 6, 2015

Protecting Agricultural Land, Water and Natural Areas

Q#1: How can the plans better support the long-term protection of agricultural lands, water and natural areas?

- ◆ Expand the Greenbelt Plan boundaries in order to permanently protect agricultural and natural land from development, while supporting further intensification in urban areas. Review planning mechanisms to address the issue of previously-approved development plans (i.e. “grandfathered”) being allowed to remain approved under outdated legislation.
- ◆ MMAH developed a [draft performance monitoring framework](#) with indicators to measure the performance of the Greenbelt Plan. This performance monitoring framework could be expanded and should align with all relevant plans including the Big Move.
- ◆ Support research on a province-wide environmental health tracking system to collect and analyze indicators of environment and human health. Such a system can identify linkages and support policies to protect human health and inform land use planning. It can also be used to increase public awareness of the health benefits in protecting water, natural areas and agricultural lands.
- ◆ Develop stronger asset understanding, governance and market parameters for natural capital. For example, assist municipalities in developing asset management plans for their green infrastructure assets and integrate natural capital assets into land use development decision making and carbon market mechanisms. Please refer to the following Case Study: [Town of Aurora: The Economic Value of Natural Capital Assets](#).
- ◆ Avoid siting new public highways, transit lines, airports, railways, gas and oil pipelines, sewage and water service areas, power transmission and telecommunication lines throughout the natural core areas, natural heritage or hydrogeological sensitive feature areas of the Greenbelt Plan area. Conduct health impact assessment prior to siting the same within communities where people live, work and play.
- ◆ Using land use planning tools, complete communities can be developed with integrated green space and natural heritage features which reduce the impacts of development on our natural systems and food producing agricultural lands. These areas will help improve air quality, mitigate climate change impacts, contribute to carbon sequestration and storage, provide shade from heat and help buffer against the damaging effects of flooding during storm surges.
- ◆ Adopt the recommendations from The Framework for Recreation in Canada regarding land use planning and recreation/parks/green space and include incentives for municipalities who meet or exceed targets for parkland and green space². Public recreation, parks and green space play an important role in enhancing physical, mental and social wellbeing, building stronger families, providing connections to nature, as well as contributing to the overall vitality of a community, and increasing access to public parks and green space is of particular benefit to people living with lower incomes.

² Canadian Parks and Recreation Association and the Provincial/Territorial Parks and Recreation Associations (2015). A Framework for Recreation in Canada 2015: Pathways to Wellbeing. Accessed at: www.cpra.ca/UserFiles/File/EN/sitePdfs/initiatives/National%20Framework/Framework%20For%20Recreation%20In%20Canada_EN2.pdf

- ◆ Strengthening Provincial policies and funding that support a network of open spaces and trails will ensure municipalities have the support and ability for local level implementation.
- ◆ Ensure the goals of the four plans align with the goals/implementation plan of Ontario's Trails Strategy http://www.mtc.gov.on.ca/en/sport/recreation/trail_strategy.shtml
- ◆ Increase the ability of the Plans to ensure consideration of the natural environment in planning decisions so that requirements aimed at protecting, expanding and integrating natural heritage systems are applied and given equal weight to other planning considerations.
- ◆ Natural heritage policies within the various Plans should be made consistent with the highest levels of protection being provided. This increased consistency and flexibility would eliminate confusion and complexity associated with interpreting multiple Plans with differing protections and policies and how they apply to lands in close proximity.
- ◆ Add designated river valley protection to green spaces and natural heritage systems even if they do not have a river course directly running through them. In doing this, these lands are provided with extra protection and greater recognition of the role they play in protecting the water quality and ecosystem of the river valley. This designation should be available for both public as well as private lands so that added protection can be provided to protect the ecological integrity of river systems and to expand the Greenbelt.
- ◆ Ensure the Plans have hydrogeological planning across their jurisdiction/communities.
- ◆ The Plans should preserve and protect agricultural lands, forest and freshwater systems and natural areas to help promote healthy food systems, provide food security and the resiliency of the ecosystem.
- ◆ Encourage municipalities to develop sustainability plans to protect agricultural economies. This may include supports for agricultural production, distribution, and/or agri-tourism.

Keeping People and Goods Moving, and Building Cost-Effective Infrastructure

Q#2: How can the plans be strengthened to ensure our communities make best use of key infrastructure such as transit, roads, sewers and water?

- ◆ Identify public transit and active transportation as a first priority for transportation infrastructure planning and major transportation investments. Planning tools can promote/direct the development of transit-oriented communities which reduce vehicle-kilometres-travelled and associated emissions of greenhouse gases and local air pollutants, support active transportation, promote physical activity, support multi-modal trips and have reduced traffic casualty rates. It is important that sustainable modes of transportation (e.g. public transit, carpooling, cycling and walking) are accessible, affordable and available with supportive infrastructure (e.g. bus bike racks and shelters).

- ◆ Introduce the concept of building "complete streets" for creating walkable and transit-supportive communities. *Complete streets* are designed and built to address the needs of users of all ages, abilities, modes of travel including pedestrians, public transit, cyclists, and motorists, as well as place-making and green infrastructure. Evidence shows *complete streets* are beneficial to health due to increased physical activity, increased traffic safety, better air quality, lowered body weight and improved physical, mental and social health.³ Many municipalities are developing best practice design guidelines for *complete streets*, which could be adopted for use in designing new streets in other urban centres in Ontario.
- ◆ Enhance density and intensification targets to ensure alignment with the Ontario Ministry of Transportation Transit-Supportive Guidelines (TSG). For example, it was identified in the "Improving Healthy By Design in the Greater Toronto-Hamilton Area" that the density target of 50 people and jobs per hectare within new greenfield developments does not support the "level of transit coverage and service which is competitive with average automobile commuting times, including time walking to and from transit service", as is identified within the TSG.
- ◆ Consider opportunities to identify more comprehensive funding options for active transportation and transit infrastructure. Efforts such as the Places to Grow Implementation Fund, the Big Move proposed funding strategies and funding grants planned within the CycleON# Ontario Cycling Strategy are promising steps. However, challenges remain with provincial plans only partially funded (e.g. Big Move) and insufficient revenue and funding tools for municipalities to support the much needed infrastructure and transit. Examples of some opportunities are the identification of additional revenue tools to ensure that growth pays for growth, the concurrent review of development charges to ensure full recovery for transit infrastructure and clarity on the extent to which development costs may favour greenfield development over intensification objectives. Consider also the extent to which transit affordability to users can be considered in funding allocation.
- ◆ Transit enables people to access employment, education, health and social services, food, and recreation which contribute to health. It also plays a role in promoting inclusive communities. Although everyone benefits from transit, it is particularly important for people on a low income who are often dependent on transit to access jobs, food, recreation and other amenities. Incorporating transit affordability for people on a low income into provincial policies reduces inequities in access to employment and services. Consider allocating a portion of new funding for transit expansion to improving transit affordability for people on a low income.
- ◆ Promote sustainable transit through higher, transit supportive, density targets for greenfield development, as per recommendations presented in the "Improving Health by Design in the Greater Toronto-Hamilton Area" by Medical Officers of Health in the area. Specifically, the report discussed that: "The Plan identifies that a potential majority, up to 60%, of new developments may be greenfield developments, which are to achieve a minimum density target of 50 people and jobs per hectare. According to the Transit Supportive Guidelines, this density can typically only support basic transit service with a bus every 20 to 30 minutes, yet these Guidelines state that there is a need to "plan for a level of transit coverage and service which is competitive with average automobile commuting times, including time walking to and from transit service. Essentially, there

³ Toronto Public Health. Healthy Streets: Evidence Review. October 2014. City of Toronto. (<http://www.toronto.ca/health>)

needs to be enough people living in an area to support the efficient placement of services that can be reasonably reached by walking or cycling.”¹

- ◆ Improve interregional transit plans to support movement of goods and people throughout Ontario. Provincial efforts to implement the Big Move Transit Plan need to be commended. However, there is no clear regional transit plan for municipalities that are part of Places to Grow, but not covered by the Province’s largest transit plan for the region: the Big Move for the Greater Toronto and Hamilton Area. While focusing transit efforts on areas with higher densities is a reasonable approach, smaller communities outside the Greater Toronto and Hamilton Area are also an integral part of the Golden Horseshoe and need a better direction on how the plans will facilitate their integration with transit across the entire region. This public transit infrastructure will help reduce the need for future highway expansions leading to fewer cars while advancing the establishment of a system of connected mobility hubs.
- ◆ Clearly define the Places to Grow tools to promote its policy 2.2.5, which aims for increased residential and employment densities in existing and planned transit in major transit station areas and intensification corridors designated in official plans. The provincial government “Performance Indicators for the Growth Plan for the Greater Gold Horseshoe” indicate that 43% of major transit station areas that could be measured had densities below the recommended 50 people and jobs per hectare needed to support transit. More than half of the measured areas had existing stations, while the other half had planned stations.⁴ Additional timely monitoring and planning tools may be needed to promote alignment of land use with transportation planning that focuses on high activity nodes/corridors.
- ◆ Ensure planning for bicycle networks is coordinated across and within the Province. Regional and local municipalities, conservation authorities and other levels of government need to coordinate planning activities to ensure existing and planned infrastructure to support bicycle networks are efficient and well connected. A variety of cycling facilities and traffic calming measures are needed to encourage cyclists of all ages and abilities. Facilities should be context sensitive and work to create a comprehensive cycling network that meets both recreational and utilitarian needs. In order to increase cycling mode share and reduce injuries, dedicated and separated facilities are encouraged where possible.
- ◆ Consideration should be given to the development and implementation of transportation demand management programs for employment, services and freight (to consolidate goods movement and reduce truck trips). Consider if transportation demand management considerations could be incorporated in complementary policies such as the Planning Act review process.

Fostering Healthy, Livable and Inclusive Communities

Q#3: How can the plans continue to support the design of attractive, livable and healthy communities that are accessible to all Ontarians at all stages of life?

⁴ Ministry of Municipal Affairs and Housing. (2015). Performance Indicators for the Growth Plan for the Greater Golden Horseshoe, 2006. Queen’s Printer of Ontario. Pages 10-11. Retrieved from <http://www.mah.gov.on.ca/AssetFactory.aspx?did=10849>

- ◆ Expand the use of indicators to better monitor the achievement of compact, complete communities, including the explicit assessment of health impacts of land use and transportation planning. This can be done provincially by developing targets and indicators. It can also be achieved locally by clearly expressing the role that public health units can have in the identification of local public health impacts of land use development. Building on the growing body of evidence linking human health and well-being with the natural and built environment, the province should lead the use of health impact assessments to identify benefits and potential negative outcomes as an important consideration in the development of complete communities.
- ◆ Increase support for affordable housing through increasing availability of mixed use, complete communities with integrated public transit. Currently, Places to Grow directs municipalities to establish and implement minimum affordable housing targets in accordance with Policy 1.4.3 of the Provincial Policy Statement and to develop a municipal housing strategy. However, there is evidence to suggest that housing affordability and high real estate costs are pushing people to live further than their ideal location. Long distances between homes, businesses and amenities result in longer commuting time and can influence health. More time spent in personal vehicles contributes to air pollution and greenhouse gas emissions, with less personal time for social and recreational activities, including physical activity. Consider options to provide more guidance on how municipalities are to achieve affordable housing targets. Consider also strengthening municipal planning tools by including inclusionary zoning and incentives to develop good quality affordable rental units. Furthermore, consider the extent to which better data and indicators on housing affordability can be developed in a way that could be directly linked to the policy targets.
- ◆ Consider policies that support apartment tower neighbourhood renewal and revitalization for the purposes of providing more affordable, quality housing in areas in the Greater Golden Horseshoe; and for creating complete communities in the in apartment neighbourhoods. Findings in the report *Tower Neighbourhood Renewal in the Greater Golden Horseshoe*⁵ prepared for the Growth Secretariat recommend that mixed use intensification of the often isolated apartment tower neighbourhoods can make these sites become connected, integrated, and complete communities.
- ◆ Consider the improvement of employment land uses to identify types of employment that can better support services in complete communities. Currently, Places to Grow identifies a diverse mix of land uses, a range and mix of employment and housing types, high quality public open space and easy access to local stores and services as part of complete communities (Item 2.2.2) and transportation planning (Item 3.2.2). However, employment and residential density targets are usually described in general terms without a clear distinction of general employment, which includes important uses such as logistics and industry and amenities that may support residents (e.g. schools, services, healthy food). For communities to support positive health outcomes, density needs to complement land use mix, service proximity and connectivity to enable safe, sustainable and active modes of transportation. Unless daily destinations, including work, school, and sources of healthy food (i.e grocery stores and markets) are within a convenient distance and supported with facilities to safely and comfortably accommodate walking, cycling or public transit, the car will remain the default mode of travel. Consider the extent to which employment land use policies and targets can be strengthened to make a better distinction of the type of land uses that can support residential living. This may enable the province to identify incentives to encourage land uses such as schools in residential communities where they are needed and not just in areas where existing construction cost considerations determine.

⁵ Available at <http://www.cugr.ca/tnrggh>

- ◆ Ensure human scale factors are explicit within the policies. In the current policy, only absolute residential or employment density targets by area are identified; however, the same targets could be achieved through a reduced number of very high density tall buildings or through a more homogeneous distribution of medium density development. Experts in land use planning and urban design caution that taller buildings along a transit corridor do not necessarily equal healthier, walkable communities and cities. Land use mix, public transit, diversity in employment and housing including affordable housing, and proximity to amenities are the more important factors for promoting walkable and complete communities.⁶ Human scale factors can be considered to promote walkability, connectivity, housing affordability. Identify for instance the extent to which existing tools such as the LEED Standard for Neighbourhoods can help support the message of human scale development.
- ◆ Invest in applied research to collect the evidence and best practices on what parameters constitute a healthy community from a land use planning perspective. For example: what is the best evidence on separation distances for protecting neighbourhoods from traffic- and industry-related air pollution; what climate-resilient measures best protect communities from extreme heat and other extreme weather events?
- ◆ Incorporate complete streets policy language within the Plans and strong, direct language to ensure that municipalities plan streets for walking and cycling.
- ◆ The plans should focus on increasing local food production year-round to improve resilience and food security. Supporting local food production and procurement decreases emissions associated with long distance transportation of food. Access to a dependable and affordable supply of nutritious food also contributes to people reaching their full physical and mental potential and lowering their risk for chronic diseases. It is important to protect the Greenbelt and other agricultural lands that are close to the urban markets. Also support further research on the environmental and economic value of a local food system.
- ◆ Policies to support urban agriculture and food systems connections from cities to rural agricultural lands should be included as part of building food-friendly, healthy communities. Urban food production, waste reduction through composting, and related community food initiatives are a key part of building healthy, inclusive and livable communities. Policies for urban food production should consider how it nourishes people and the environment, protects against climate change, promotes social justice, creates local and diverse economic development and builds community.
- ◆ Access to nutritious, healthy food within walking and biking distance is essential for building healthy communities. The Growth Plan should require inclusion of healthy food sources as part of the infrastructure for creating *complete communities*.
- ◆ The residential intensification rate should be increased beyond 40% minimum rate for the GTA area to encourage complete communities and protection of environmentally sensitive areas such as the Greenbelt, Oak Ridges Moraine and the Niagara Escarpment.

⁶ Condon, Patrick (2010). Seven Rules for Sustainable Communities. Washington, DC: Island Press.17-35.

Building Communities That Attract Workers and Create Jobs

Q#4: How can the plans better support the development of communities that attract workers and the businesses that employ them?

- ◆ Involve the Ministry of Environment and Climate Change to ensure that industrial development balances the economic and business needs of our communities while ensuring that incompatible uses do not negatively impact sensitive populations in terms of air quality, noise and other environmental issues. Use health and environmental impact assessments when planning and siting potential industry development.
- ◆ Ensure complementary policies which encourage youth retention. The jobs need to be where the youth live and since 18-24 year olds have high unemployment rates economic development departments need to factor in youth retention.
- ◆ To be more inclusive from an equity perspective, integrate different types of jobs in a community. This will help to decrease segregated communities and address the need for a mixture of jobs that are spread out over smaller communities.
- ◆ Leverage tax incentives in a more spatial way. Currently, in some regions greenfields are used to develop employment lands due to cheap land/low taxes; however, infrastructure such as roads needs to be built to support this land use. We need to use tax incentives to ensure employment is being located in the right place.
- ◆ Revise the Planning Act to prevent developers from converting employment lands into residential lands. Support initiatives that would provide protection for municipalities during appeals to the Ontario Municipal Board.
- ◆ For communities to be complete and support health, density needs to coexist with land use mix, employment areas, service proximity and connectivity to enable safe, sustainable and active modes of transportation. Unless daily destinations, including work, school, and grocery stores can be conveniently reached by walking, cycling or public transit, the automobile will remain the default mode of travel.
- ◆ Ensure that new retail development is better integrated with residential development through appropriate location and functions. It cannot be just a shopping mall but should have a “sense of place” and contribute to the creation of complete communities.
- ◆ An increasing body of evidence is demonstrating the value of local agriculture and natural resources to Ontario’s economic, environmental and social health. It is important to collect and share this evidence in order to inform decisions on agricultural policy, aggregate extraction and protection of natural environments.
- ◆ It is important that the provincial plans include policies that support economic development of rural communities taking advantage of local resources. Both the agrifood and mineral aggregate resource sectors should be encouraged but better regulated to ensure that the natural environment is protected.

- ◆ Local employment opportunities should be encouraged through policies that support urban agriculture, food production and associated activities that provide affordable and nutritiously enriching food.
- ◆ In order to intensify the corridors within employment areas, the review should consider introducing more flexible land use policies. The Growth Plan in particular should provide more specific policies that encourage or require achieving higher densities along urban corridors and around transit stations.

Addressing Climate Change and Building Resilient Communities

Q#5: How can the plans help address climate change?

- ◆ Integrate policies which address climate change within the four Plans. Ontario has the opportunity to become a leader in the green economy and healthy built environments by planning complete communities and supporting sustainable buildings, infrastructure and transportation systems that reduce greenhouse gas emissions. The health co-benefits include better air quality, reduced urban heat island, increased community resiliency, protection from infectious diseases and lower health care costs. It is important to take steps to measure and report on these benefits in order to demonstrate the advantages of resilient communities. There is growing evidence that the natural environment provides many benefits to human health including improving air quality, reducing greenhouse gas emissions, preserving water quality, providing opportunities for physical activity and recreation, and addressing social and mental health.
- ◆ Protect and support natural heritage areas as they contribute to carbon sequestration and storage. They also combat climate change impacts by providing natural shade and addressing urban heat islands and help buffer against the damaging effects of flooding during storm surges.
- ◆ Consider the contribution of nature and green infrastructure to climate change mitigation and adaptation through further research in order to better protect ecosystems and human health. In addition, the Plans need to consider natural capital during development to support the functions of previous ecosystems (i.e. storm water management).
- ◆ Support enhanced protection and planting of urban forests as an essential component of a climate change strategy. Ontario's urban forests have an important role to play in reducing emissions and providing carbon sinks. In fact, our urban forests are unique resources equipped to address both emission reduction and climate change adaptation. Urban trees help mitigate climate change by directly sequestering carbon and reducing energy use and its associated carbon emissions. They support climate change adaptation by providing the backbone of our cities' green infrastructure that reduces flooding and moderates urban temperature, thereby further reducing energy use.
- ◆ Amend the Plans to require that updated municipal official plans integrate sustainable energy policies and include an assessment of the GHG emission performance of official plans relative to business-as-usual outcomes.
- ◆ Consider climate change impacts in order to reach greenhouse gas (GHG) emission targets. The Plans can help lead to improvements to the province's transportation systems. These systems need to be well-connected, efficient and provide reliable transportation. Substantially higher

investments in public transit infrastructure need to be improved over the short and long term to shift the reliance from vehicles to sustainable transportation measures. The Plans can also help to ensure buildings are designed to be energy and water efficient, climate resilient and pedestrian and cycling oriented.

- ◆ Suggest the Plans directly reference climate change and its impacts on the environment and human health. Climate change adaptation, mitigation, vulnerabilities and increased resiliency should be reflected in policies to show consideration of these issues within the Plans.
- ◆ Community infrastructure and transportation policies play a key role in reducing health inequalities associated with climate change related health outcomes. Socio-economically disadvantaged communities are more vulnerable to climate change related events such as extreme heat, flooding, power outages and displacement from the home, food insecurity and breakdown of social support networks. Groups with lower amounts of social support, education, or economic resources are also the most likely to be affected by extreme weather events. Policies that support access to public service facilities, public transit, and green space within communities are few of the facilities and services which can help build resiliency among the most vulnerable.
- ◆ Ensure our communities are planned to be more resilient and sustainable to help them prepare and adapt to climate change impacts (e.g. extreme weather events). We support updates to the *Building Code* and other planning policies to further encourage uptake of development standards and landscaping features (e.g. Low Impact Development) that reduce energy and water use while incorporating natural and built shade to reduce exposure to extreme heat and UV rays. In addition, sewage and drinking water systems need to be protected from flooding, overflows and contamination and power failures.
- ◆ Consider providing standardized vulnerability assessment tools to municipalities and key sectors to determine these risks and areas of opportunity. The Ministry of Health and Long Term Care has developed a *Climate Change Health Vulnerability Assessment and Adaptation Guideline* for health units across Ontario. The Ministry of Environment and Climate Change is developing climate and health models to support the health vulnerability assessment. Examples such as this showcase the value of cross-sector collaboration in the development of tools to assess climate change impacts, and in the implementation of action plans to build resiliency.
- ◆ Conduct a review of existing infrastructure funding arrangements (e.g., development charges, land transfer tax rebates, funding formulas for schools and hospitals, and so on) and the incentives they provide with respect to the location of future development and the appropriateness of those incentives given the goals contained in provincial growth and climate change plans.
- ◆ Develop a rigorous assessment of the likely impact of the implementation of recent planning initiatives, including updates to the land use Plans under review at present as well as revisions to the *Planning Act* and PPS, on future GHG emissions and other pollutants (e.g. PM2.5) relative to business-as-usual scenarios. (e.g. See Town of Oakville PM2.5 bylaw)
- ◆ Support healthy built environments by planning complete communities and sustainable transportation systems that reduce reliance on fossil fuels that contribute to greenhouse gas emissions. Ensure communities are designed to be interconnected, high density, mixed use and walkable. Public transit needs to be made a first priority for transportation infrastructure planning and major transportation investments. Intensification and mixed use development will help reduce

commuting travel distance and support greater use of sustainable travel modes thereby reducing GHG emissions associated with urban transportation.

- ◆ Provide policy support for energy efficient buildings as well as incentives and programs to support uptake in the area of green/ low impact development and retrofits.
- ◆ Ensure that greenhouse gas emissions are factored into infrastructure development decisions. Require transportation and infrastructure options to factor in greenhouse gas emission impacts and opportunities to minimize greenhouse gas emissions. Co-benefits include improved air quality. The greenhouse gas emissions calculations should factor in lost carbon storage capacity.
- ◆ Identify additional policies and planning initiatives to achieve the reductions in GHG emissions and other pollutants (e.g. PM 2.5) needed to meet the Province's GHG emission reduction target. The need to address building energy use in existing building stock and transportation are of the utmost priority.
- ◆ Review and update density targets and land allocations to reflect their necessary contribution to supporting the achievement of the province's greenhouse gas reduction targets.
- ◆ Increase momentum for the creation of holistic and integrated long term community energy plans that integrate and recognize opportunities to build a more cost effective and resilient energy system by better integrating community electricity and thermal energy into the overall land use planning process. Ensure siting rules are established that consider health and environmental impacts.
- ◆ The majority of lands suitable for new trees are privately owned, therefore increasing support for planting urban trees by funding programs that incent homeowners and community groups to plant more trees and forests would contribute significantly to community livability, resilience and competitiveness as well as contributing to air pollution and greenhouse gas reductions.
- ◆ The province working together with municipalities, ENGOs and local agencies should develop a coordinated urban forest strategy to protect urban and heritage trees..
- ◆ Consider urban agriculture as a means of reducing emissions from food transportation and to decrease heat islands through tree coverage
- ◆ Develop tax policies that reward smart growth planning and climate change goals and discourage unsustainable planning, and development; and harmful environments and pollutants (e.g. [Town of Oakville Health Protection & Air Quality By-Law](#)).
- ◆ Encourage the creation of storm water charge funds across municipalities to address lack of infrastructure and repair for old and new developments. See [City of Mississauga](#) for examples of this program.
- ◆ Build on the Provincial Policy Statement to establish climate change criteria for planning resilient landscapes that is context-sensitive to apply broadly across the Province.

Improving Implementation and Better Aligning the Plans

Q#6: How can the implementation of the plans be improved?

- ◆ Improving the collection and reporting of key performance indicators would provide greater clarity on the progress of Plans towards the policy goals of using existing assets, managing growth, protecting natural heritage and agricultural lands, as well as mitigating and adapting to the changing climate.
- ◆ The Plans should increase their transparency regarding growth projections and assumptions used, land budgeting, implementation progress, and alignment between provincial, regional and municipal Plans.
- ◆ Health Impact Assessment language should be introduced in the plans as well as the *Planning Act* to ensure their integration and use throughout the planning process.
- ◆ Coordinate cross-ministerial collaboration to integrate various provincial plans and identify synergies and conflicts between the various plans, policies and actions.
- ◆ Align with work of others to ensure a healthy food system in Ontario. For example, many key agriculture, food, and health players have been involved in a collective impact approach to develop a food and nutrition strategy for Ontario. Such a food system plan could address all of the goals of this review, and particularly address the need for a “cross-government, multi-stakeholder coordinated approach”.⁷
- ◆ Greater accountability in the implementation of the plans and related outcomes needs to occur. This could be addressed through linking incentives to monitoring and rewarding municipalities for exceeding minimum requirements (i.e. link provincial investments in public transit and transportation infrastructure to municipal performance and adherence to requirements for density and land use mix).
- ◆ Provide direction for land use and transportation planning to work with public health to support improved health outcomes and mitigate potential negative impacts on health and the environment.
- ◆ Determine a method for how to prioritize Plans when competing issues arise.
- ◆ Continue to coordinate reviews of complementary plans (i.e., PPS, the Big Move, Lake Simcoe Protection Plan, Climate Change Action Plan, etc.) to ensure consistent messaging and identify synergies and conflicts within the plans.

⁷ Ontario Food and Nutrition Strategy Design Team (2014). Ontario Food and Nutrition Strategy. A plan for healthy food and food systems. Available from: <http://sustainontario.com/work/ofns/>